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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA, S.K.,
TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687- TLT

**DECLARATION OF JESSICA KARP
BANSAL IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO MOTION TO STAY**

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DECLARATION OF JESSICA KARP BANSAL

I, Jessica Karp Bansal, declare as follows:

1. I am an attorney at law duly licensed and entitled to practice in the State of California. I am an Attorney at National Day Laborer Organizing Network, counsel of record in this action for Plaintiffs. I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.

2. I make this declaration in support of Plaintiffs' Opposition to the Motion to Stay.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the U.S. Department of Homeland Security Press Release, dated August 1, 2025, *DHS Statement on Activist Judge Delaying TPS Termination for Honduras, Nepal, and Nicaragua*, and available at <https://www.dhs.gov/news/2025/08/01/dhs-statement-activist-judge-delaying-tps-termination-honduras-nepal-and-nicaragua>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of August 2025, at Claremont, CA.

/s/ Jessica Karp Bansal
Jessica Karp Bansal

Exhibit 1



U.S. Department of Homeland Security

DHS Statement on Activist Judge Delaying TPS Termination for Honduras, Nepal, and Nicaragua

Release Date: August 1, 2025

For decades, TPS has been abused as a de facto amnesty program to allow unvetted aliens to remain in U.S. indefinitely

WASHINGTON – Today, the Department of Homeland Security (DHS) issued the following statement after a federal judge in California postponed the termination of Temporary Protected Status (TPS) for Honduras, Nepal, and Nicaragua, wrongly finding the cancellation was rooted in “racial animus.”

In a judicial ruling that sounds like a *New York Times* opinion piece, activist Judge Trina Thompson—a Biden appointee—wrote that Secretary Kristi Noem is telling the 60,000 aliens on TPS to “*atone for their race, leave because of their names, and purify their blood.*” She even likened terminating TPS to the Atlantic slave trade because “*the United States has a long history of transporting individuals against their will, to places unfamiliar with them.*”

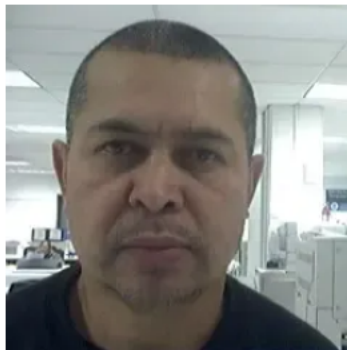
Judge Thompson’s editorializing is not only disgusting but also ignores the plain meaning of federal law. TPS was always intended to be temporary. Both Nicaraguan and Honduran TPS have been in place for over 20 years following natural disasters. Since then, the countries have made tremendous strides to recover, and as a result, it is safe for their nationals to return home.

“*Restoring integrity to our immigration system to keep our homeland and its people safe. That is all we—and the American people who elected President Trump in a landslide election—seek,*” said **Assistant Secretary Tricia McLaughlin**. “*TPS was never meant to be a de facto asylum system, yet that is how previous administrations have used it for decades. This is yet another example of how out of control judges are race-baiting to distract from the facts and President’s constitutionally vested powers under Article II. We will appeal, and we expect a higher court to vindicate us.*”

For decades, TPS has been abused as a *de facto* amnesty program to allow unvetted aliens to remain in U.S. indefinitely. Too often these programs have been exploited to allow criminal aliens to come to our country and terrorize American citizens. When child abusers and other violent criminals can hide behind a humanitarian designation, the system is broken. President Trump and Secretary Noem are restoring common sense to our immigration system and returning TPS to its original status: TEMPORARY.

Below are some examples of criminal aliens who exploited the TPS program:

- **Angel Ponce**, a criminal alien from Honduras, convicted of **aggravated assault and the offense of possessing, selling, or manufacturing a dangerous weapon.**



- **Jose Zelaya Andrades**, a criminal alien from Honduras, convicted of **aggravated assault with a deadly weapon with intent to kill.**



- **Getsel Enrique Gonzalez Ocampo**, a criminal alien from Honduras, convicted of **assault on a female (domestic violence) and resisting a public officer**.



- **Jose Amilcar Funez**, a criminal alien from Honduras, convicted of **assault in the second degree and sex offense against child - fondling**.



- **Juan Erazmo Ferrufino**, a criminal alien from Honduras, convicted of **domestic violence, several public intoxications**.



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Topics

[HOMELAND SECURITY ENTERPRISE \(/TOPICS/HOMELAND-SECURITY-ENTERPRISE/\)](#)

Keywords

[ALIEN \(/KEYWORDS/ALIEN/\)](#)

[ILLEGAL \(/KEYWORDS/ILLEGAL/\)](#)

[TEMPORARY PROTECTED STATUS \(/KEYWORDS/TEMPORARY-PROTECTED-STATUS/\)](#)

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